

**Compliance Letter**  
**WC Docket No. 005-196**

PCCW Global, Inc.  
(formerly BtN Access, Inc.)  
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**FCC Report on Compliance with VoIP Subscriber Notifications and E911 Compliance**

PCCW Global, Inc. (formerly BtN Access, Inc.), hereby supplements its August 16, 2005 compliance report with the following additional information:

1. As of August 26, 2005, PCCW Global obtained affirmative acknowledgements of the limitations of its VoIP service with regard to emergency dialing from One Hundred Percent (100%) of its thirty-four (34) enterprise customers. For newly signed customers, the acknowledgement of the service limitations is included on the signature page of the customer service contract. All customers, new or existing, receive or have received warning labels consistent with the FCC's requirements.
2. With regard to its Hosted PBX Service, PCCW Global:
  - a) transmits all 911 calls to the public safety answering point (PSAP), designated statewide default answering point, or appropriate local emergency authority that serves the caller's "Registered Location." Such transmissions include the caller's Automatic Numbering Information (ANI), and Registered Location to the extent that the PSAP, designated statewide default answering point, or appropriate local emergency authority is capable of receiving and processing such information;
  - b) routes all 911 calls through the use of ANI and, if necessary, pseudo-ANI, via the wireline E911 Network, and make a caller's Registered Location available to the appropriate PSAP, designated statewide default answering point or appropriate local emergency authority from or through the appropriate Automatic Location Identification (ALI) database;
  - c) obtains from each of its existing and new customers, prior to the initiation of service, a Registered Location; and
  - d) provides all of its end users one or more methods of updating their Registered Location at will and in a timely manner. At least one method allows end users to use only the same equipment (such as an Internet telephone) that they use to access their interconnected VoIP service.
3. All PCCW Global Customers must provide the Registered Location prior to receiving service or the allocation of new numbers. All of PCCW Global's Domestic Hosted PBX suppliers support 911 services. When 911 service is initiated from a device at the registered location the following will occur:
  - a) The PCCW Global Hosted PBX Servers will receive a signaling protocol from a device listed as an EM (Emergency) or 911 initiated call.
  - b) The PCCW Global Hosted PBX Servers will then signal the appropriate Service Provider gateway with the appropriate calling number information.
  - c) The service provider will then query the ALI Database for the destination of the correct PSAP.

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- d) The service provider will then route the call based on the above criteria.
- e) The PSAP will then receive the calling number and the registered location of the calling party.

4. PCCW Global obtains the Registered Location information from its end users upon placement of the initial order for service. Service is not initiated without a Registered Location on file. PCCW Global has a Registered Location for 100% of its customers.

5. In order to update their Registered Location, PCCW Global Customers can either call or email a change request into PCCW Global customer service representative for location change to an existing TN (Telephone Number). PCCW Global will then initiate a change of location for that TN with the service provider assigned for that number. The TN will be checked against the service provider's local database to ensure that the TN is properly supported by the local PSAP. Once confirmed by the service provider, PCCW Global will initiate the proper documentation for the requested change of address to the TN. Once completed PCCW Global will request a test of the 911 service with the provider, the customer, and the local public safety answering point.

6. PCCW Global does not support or offer services to 'nomadic subscribers' at this time. All customers are required to provide a Registered Location at the commencement of services. Any use by the customer of an IP-compatible device outside that Registered Location is not supported by PCCW Global and subject to the limitations of service described by PCCW Global and acknowledged by the customer.

Filed on behalf of PCCW Global, Inc. by:

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